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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,

v.

ANTHONY DESA, individually and as
Trustee of the ERBIN TRUST; JANE
DESA; ASSET FORECLOSURE
SERVICES as Trustee of
METROPOLITAN LIFE INSURANCE
COMPANY; LAS VEGAS VALLEY
WATER DISTRICT; REPUBLIC
SILVER STATE DISPOSAL; RICHARD
POLMER; FREEMAN, FREEMAN, &
SMILEY, LLP; CLARK COUNTY,
NEVADA,

Defendants.

Case No. 2:24-cv-01993-JCM-NJK

**STIPULATION BETWEEN THE
UNITED STATES AND RICHARD
FOLMER TO EXTEND RESPONSE
DEADLINE**

Plaintiff, the United States of America, and Defendant, Richard Folmer, hereby stipulate as follows:

1. On October 23, 2024, the United States filed suit to reduce the outstanding tax liabilities of defendant Anthony Desa to judgment and to foreclose upon Mr. Desa's real

1 property located at 9317 Verlaine Court, Las Vegas, Nevada 89145 (“Subject Property”).
2 ECF No. 1.

3 2. Pursuant to 26 U.S.C. § 7403(b), Richard Folmer was named as a defendant
4 because he may claim an interest in the Subject Property by virtue of an unpaid judgment
5 lien.

6 3. The United States served a waiver of the service of summons on Mr. Folmer on
7 December 4, 2024. Mr. Folmer returned a signed copy of the wavier on December 6,
8 2024. ECF No. 9. Accordingly, Mr. Folmer’s response to the Complaint is due on or
9 before February 2, 2025. Fed. R. Civ. P. 4(d)(3).

10 4. Mr. Folmer requires more time to obtain legal counsel and to formulate his
11 position in this matter. Accordingly, the Parties request an extension of thirty days to, and
12 including, March 3, 2025, for Mr. Folmer to respond to the United States’ Complaint.

13 5. Rule 6(b) authorizes this Court to grant an extension of time for good cause
14 shown. *See also* LR IA 6-1. This is the Parties’ first request for an extension of time to
15 allow Mr. Folmer to file a response to the United States’ Complaint.

16 6. By filing this stipulation, Mr. Folmer does not waive any defenses listed in Rule
17 12.

18 7. This extension is not interposed for the purposes of delay.

19 8. No party will be prejudiced because of this request.
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1 WHEREFORE, the Parties respectfully request that this Court grant their
2 stipulation extending Mr. Folmer's response deadline to March 3, 2025.

3 Dated: January 31, 2025

Respectfully submitted,

4
5 David A. Hubbert
Deputy Assistant Attorney General

6
7 s/Tijuhna A. Green
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12 *Attorney for the United States of America*

13 Dated: January 31, 2025

*scanned signature page attached.
14 Richard Folmer
210 S. La Esperanza
15 San Clemente, CA 92672
16 *Pro Se Defendant*

17 **ORDER APPROVING STIPULATION**

18 Based on the Stipulation filed by the Parties and good cause appearing, it is
19 hereby ordered that the foregoing Stipulation is approved. Richard Folmer's deadline
20 to respond to the United States' Complaint is hereby extended to March 3, 2025.

21 **IT IS SO ORDERED.**

22
23 DATED: February 3, 2025

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25 
26 Nancy J. Koppe
United States Magistrate Judge
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